April 16, 2010

Mr. Jeff Jordan
Federal Election Commission
999 E Street NW
Washington DC 20463

Dear Mr. Jordan:

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We are in receipt of your March 24, 2010 letter. We request that you dismiss the Arizona Democratic Party's partisan complaint against Jonathan Paton, because the matters raised by the Democratic Party were corrected in a timely fashion.

Jonathan Paton is a candidate for the United States House of Representatives for the Eighth District of Arizona. His federal principal campaign committee, Jonathan Paton for Congress ("federal campaign") filed its Form 1 Form 1 Statement of Organization with the Commission on January 26, 2010. See Attachment A (Form 1 dated January 20 and received by the Commission on January 26). Mr. Paton's Form 2 Statement of Candidacy was inadvertently filed late, but contrary to the Democratic Party's accusation, it is on file with the Commission. See Attachment B (Form 2). The campaign also timely filed its first Form 3 Report of Contributions and Disbursements on April 15, 2010. See Attachment C (Including Cover Page Frem April 2010 Quarterly Report).

Print to becoming a federal candidate, Mr. Paton was a state senatur in Asiroma. In November and Detember, 2009, prior to the federal campaign of the federal campaign, Mr. Paton's mate campaign account paid for two expenses relevant to his state campaign and the testing the waters stage of a federal candidacy. Once the federal campaittee was organized, it repaid the state campaign in full for the expenses on February 23, 2010. See Attachment C (Cover Page and Disbursement Page from April 2010 Quarterly Report).

In short, the minor errors raised in the Democratic Party's complaint were quickly corrected and will not be reputated. We ask that the Commission therefore dismise this matter.

Sincerely,

Kevin Herring
Campaign Manager

Jonathan Paton for Congress

¹ Notably, Arizona's campaign finance limits are even stricter than federal rules provide. Both individuals and regular PACs are permitted to give a legislative candidate only \$410. See e.g., http://www.arras.gov/shrtisss/2010/Info/Campaign_Contribution_Limits_2010.htm (Arizona Secretary of State Contribution Limit Notice).



FEC FORM 1

STATEMENT OF ORGANIZATION

FILING FEC-462801

1. Jonathan Paton for Congress

7400 N. Oracle Rd., Suite 125 Tucson, AZ 85704

NOTE: Address is different than previously reported

Email: info@patonforcongress.com

2. Date: 01/20/2010

3. FEC Committee ID #: C00474270

This committee is a Principal Campaign Committee. Candidate: Jonathan Paton

Party:

Office Sought: House of Representatives

State is Arizona in District: 08

Affiliated Committees/Organizations

Custodian of Records:

Jeffrey John Hill 4225 E. Grant Road #1 Tucson, AZ 85712 Title: Treasurer Phone # (520) 795-4210

Trensurer:

Jeffrey John Hill 4225 E. Grant Road #1 Tucson, Arizona 85712 Title: Treasurer Phone # (520) 795-4210

Designated Agent(s):

Banks or Depositories

Bank of Tucson PO Box 12766 Tucson, Arizona 85732

Signed: Jeffrey John Hill Date Signed: 04/15/2010

Official Committee URL: www.patonforcongress.com

(End FEC FORM 1)



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FEC FORM 2 STATEMENT OF CANDIDACY

1. (a) Name of Candidate (in full)						
Jonathan Paton (b) Address (number and street) 7400.N. Oracle Rd., Suite 125		Check if address	changed	2. Identificatio	n Number	
(c) City. State and ZIP Code				3. la Yhla	New	Amended
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NOTE: This designation should b	e filed with the app	ropriete office listed in t	he instructio	ons.		
(a) Name of Committee (in full)						
Jonathan Paton for Congress	•					
(b) Address (rumber, and street)						
7400 N Oracle Rd., Swite 12	5					
(c) City. State and ZIP Code						
Tucson	AZ	8570	4-			
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8 I hereby authorize the following name candidacy	d committee, which a	s NOT my principal campa	ign committe	e, to receive and	expend fund	is on behalf of my
NOTE:This designation should b	e filed with the prin	cipal cumpatyn commit	wo.			
(a) Name of Committee (in full)						
(b) Address (numšer axiil simel)	•					
(c) City. State and ZIP Code						
I certify that I have e	xemined this State	 ment and to the best of	my knowled	 Ige and belief it	is true, co	rrect, and complete.
Signature of Candidate				Date	———	
Jonsthan Paton				04/01/2010		
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FEC FORM 2 (REV 02/2009)

FEC FORM 3

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